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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: February 8, 2005

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-240) Green Peter-Lebanon #1 Project #: **V-E-05/02**

TO: Mark Newbill
Natural Resource Specialist - TFE/CHEMAWA

Proposed Action: The project activities will be conducted along the Right-of-Way (ROW) of the 115 kV Green Peter-Lebanon #1 transmission line corridor between towers 1/1 to 19/2. This corridor includes the 5 miles of Foster Tap 115 kV transmission line. The corridor along this section of the proposed project ranges from 125 to 225 feet in width and crosses approximately 19 miles of terrain through rural residential, City of Lebanon, Mallard Creek Golf Course, industrial forestlands and private farmland.

Location: The proposed project is located in Linn County, Oregon in the BPA Eugene Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, along access roads and around tower structures along the subject transmission line corridor that may impede the operation and maintenance of the identified transmission lines. BPA plans to conduct vegetation control with the goal of removing noxious weeds and tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

Specifically, this vegetation management project will involve the following actions:

- Clearing (mowing, cutting, and spraying) vegetation at tower sites.
- Selective cutting (cutting, lopping and scattering) of vegetation at throughout the ROW.
- Applying low volumes of foliar herbicide along the ROW in the fall of 2005 to control re-sprouting plants and noxious weeds, and re-application every three to four years after initial application to maintain accessibility to access roads and tower sites.

Debris will be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris will be scattered along the ROW. Removal of vegetation on slopes steeper than 20% and spanned canyons will be restricted to tall-growing species that pose a hazard to the transmission line. Trees that visually screen roads from the transmission line will be left where appropriate.

On initial entry, hand cutting and machine mowers will be used to control brush and blackberries around the tower sites. Use of Garlon 4A / web oil in a 25 percent mixture will be applied as a stump treatment for hardwood species. In forested private lands, hand cutting and machines will be used to clear tall growing trees and unwanted brush and scotch broom.

On subsequent entries, Garlon 3A and Escort (2 % in water mix) will be used to broadcast spray over machined mowed areas. Spot spray any target species in hand cutting areas, fencerows and gates. Herbicide buffers will be followed around water sources.

Analysis: A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in the Bonneville Power Administration's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

The subject corridor traverses rural residential, City of Lebanon, Mallard Creek Golf Course, industrial forestlands and private farmland.

Section 3 of the checklist identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

Water Resources: Waterbodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. Shrubs will not be cut that are less than 10 feet high where ground to conductor clearance allows. No ground disturbing vegetation management methods will be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. Adjacent to water resources only spot (cut-stump) and localized chemical treatments using practically non-toxic triclopyr (TEA) will be used.

No drinking water, irrigation wells, or water supplies were identified along the rights of way for this project.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether the proposed project will have an effect on any listed species. A species list was obtained from the United States Fish and Wildlife Service (USFWS) on January 6, 2005 for threatened and endangered species potentially occurring in the project area. In addition, a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of No Effect was made for all ESA listed species and designated critical habitat for the project.

Essential Fish Habitat: A review of NOAA database identified an Essential Fish Habitat (EFH) stream occurring in the project area. Measures identified for water resources will be followed for EFH. A determination was made that this project will not adversely affect essential fish habitat.

Cultural Resources: No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist will be contacted.

Re-Vegetation: Native grasses are present on the entire right-of-way and are expected to seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads.

Monitoring: The entire project will be inspected during the work period. Additionally, monitoring for the follow-up herbicide treatment will be in the fall of 2005.

Findings: This Supplement Analysis finds that (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ Shawn Barndt
Shawn L. Barndt
Environmental Scientist

CONCUR: */s/ Thomas C. McKinney* DATE: 2/10/2005
Thomas C. McKinney
NEPA Compliance Officer

Attachments:
Green Peter-Lebanon #1 05 Vegetation Management Checklist
USFWS Species List Reference # 1-7-05-SP-0108
Effects Determination

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
B. Sherer – KEP-4
J. Sharpe – KEPR-4
H. Adams – LC-7
J. Hilliard Creecy – T-DITT2
M. Johnson – TF/DOB-1
K. Barber – TFEK/CHEMAWA
J. Domschot – TFE/ALVEY
A. Sundberg – TFE/ALVEY
Environmental File – KEC-4
Official File – KEP (EQ-14)

Sbarndt:sb:4722:2/8/2005 (KEP-KEPR-4-W:\EP\2005 FILES\EQ-14-Supplement Analysis\FEIS-0285-SA-240-Green Peter-Lebanon.doc)

Vegetation Management Checklist

Green Peter – Lebanon

Project #: V-E-05/02

Mark A. Newbill, NRS

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

The vegetation control method used on the Right-of-Way (ROW) will be hand cutting and machine mowing.

The project will include: access roads, tower sites, and switch platforms.

The project will not include: danger trees and microwave beam paths.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Green Peter – Lebanon	19 miles & 115 Kv	125 feet	1/1 to 19/2
Includes the Foster tap line Linn Co.	5 miles & 115 Kv	100 feet	1/1 to 4/5

1.2 Describe the vegetation needing management.

Vegetation type: Douglas-fir, Hemlock, Cedar, Big Leaf Maple, Red Alder, Cottonwood, Wild Cherry, Oak, and Ash.

Low - Med. Density (50-250 stems per acre)

Noxious weeds: Blackberries, Poison oak, and Scotch Broom.

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why.

Removing small fir trees and hardwoods allows grass and small shrubs to expand. They shade out the undesirables and thus promote the LGPC. Removal of tall growing hardwoods from fencerows and edges of fields in rural farmland is another goal.

Areas in private or rural residence (backyard) we will work with landowners to create win – win situation (landowner gets a small tree / BPA gets line reliability). Planting the "right tree" in the "right place" can achieve this goal.

In forestry settings, removing noxious weeds from expanding is consistent with 2002 farm bill and Oregon Dept. of Agriculture policies. Removing small conifers and hardwoods allows the establishment for other small growing plants to get established. Once the low growing plant communities (LGPC) get established, they help reduce the number of invasive weeds and trees while improving wildlife habitat.

1.4 Describe overall management scheme/schedule.

Initial entry – In forest and farmland, hand cutting and machine mowers will be used to control brush (edges of fields / fence rows) and blackberries around the tower sites. Use of Garlon 4 / web oil in a 25 % mixture will be applied as a stump treatment for hardwood species. In forested areas (Private Lands), hand cutting and machines will be used to clear tall growing tree species and unwanted brush / scotch broom. Project will begin in the spring (May) and be completed with 4-5 weeks.

Subsequent entries – Return 3 months (fall) to apply a foliar herbicide treatment. Use Garlon 3A and Escort (2 % in water mix) to broadcast spray over machine mowed areas. Backpack spray any individual target species (trees or noxious weeds) in hand cutting areas, fence rows, and around gates. Herbicide buffers will be followed around water sources (see table 3.1) and the project detail sheet.

Future cycles – Try to achieve a 5-year vegetation control cycle.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

Rural Residential
City of Lebanon
Mallard Creek Golf Course
Private Farmland
Private Timber Land

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., doorhanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.

Every landowner is sent a letter notifying them of the scope and timetable for the project. Letters will be sent out 4 weeks prior to start date.

2.3 List the specific land owner/landuse measures — determined from the handbook or through your consultations with the entities — that will be applied.

None Known

2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.

None Known

2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.

None known

2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.

None known

3. IDENTIFY NATURAL RESOURCES

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
133+85	2/2	Big Alder Ck	No	HCO	None	DNA	35 ft	Canyon - SKIP
188+50	3/2	Unnamed ck	No	HCO	None	DNA	35 ft	Canyon- Skip
208+80	3/4	Coal Ck	No	HCO	None	DNA	35 ft	Canyon - Skip
226+80 232+80	4/1	Lewis Ck Unnamed Ck	No	HCO	None	DNA	35 ft	
238+40	4/2	Unnamed Ck	No	HCO	None	DNA	35 ft	
252+70	4/3	Unnamed ck	No	HCO	None	DNA	35 ft	
327+50	6/1	Fall ck	No	HCO	N/A	DNA	35 ft	
329+65	6/1	Spring	No	HCO	N/A	DNA	35 ft	
359+60	6/4	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
403+40	7/3	McDowell Ck	No	HCO	N/A	DNA	100 ft	Canyon - SKIP
470+20	7/4	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
440+95 443+00	8/1	Unnamed Ck Unnamed ck	No No	HCO	N/A	DNA	35 ft	
469+96	8/4	Bill ck	No	HCO	N/A	DNA	35 ft	
619+61	10/5	Hamilton Ck	No	HCO	N/A	DNA	35 ft	
659+51	11/3	Mint Ck	No	HCO	N/A	DNA	35 ft	
676+85	12/2	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
706+02	12/5	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
754+65	13/3	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
801+73	14/3	Unnamed Ck	No	HCO	N/A	DNA	35ft	
807+35 808+58 809+40	14/4	Unnamed Cks (3)	No	HCO	N/A	DNA	35 ft	
865+52 866+28 867+82 869+48 869+75	15/3	Unnamed Cks (5)	No	HCO	N/A	DNA	35 ft	

873+04 874+88 879+05 881+57	15/4	Unnamed Cks (4)	No	HCO	N/A	DNA	35 ft	
905+97 907+88 909+42 911+15	16/3	Unnamed Cks(4)	No	HCO	N/A	DNA	35 ft	
957+22	17/3	First CK	No	HCO	N/A	DNA	35 ft	
973+17	17/5	Unnamed Ck	No	HCO	N/A	DNA	35 ft	
1008+00 1008+91	18/3	So. Santiam River	YES	HCO	N/A	DNA	35ft	

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).

Herbicides will not be used near irrigation, wells or springs

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
100	16/2	Spring	None	35 ft	Hand cut if needed

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
18\3	18\4	Anadromous Fish	Buffers will be used. See table 3.1

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

Measures: Small shrubs and vine maple will be left for bird habitat.

3.5 List any visually sensitive areas and the measures to be taken at these areas.

The line criss-crosses City Streets, County Roads, and US Highways. Trees will be topped or left if adequate clearance exists. All woody debris will be chipped back 50 feet from the blacktop. Locations of road crossings are listed below.

Span		Describe sensitivity	Method/mitigation measures
To	**From**		
5/1	4/4	Sunnyside Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
7/1	6/6	Linn Co. Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
11/1	10/5	Upper Berlin Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
12/3	12/2	Berlin Ridge Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
13/3	13/2	Bellinger Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
14/6	14/5	Bellinger Scale Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
16/2	16/1	Weldon Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
17/3	17/2	Hidden Valley Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
18/4	18/3	River Road	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
18/5	18/4	Perkins Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.
19/2	19/1	Weirich Rd	Top / trim trees as needed. Chip and clean-up debris from each of these road crossings.

3.6 List areas with cultural resources and the measures to be taken in those areas.

None Known

No known cultural resource present. No ground disturbing activity will occur. If evidence is found of cultural resource (artifacts, features, burial sites), work will cease immediately and appropriate authorities will be contacted.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

The project area has both forest (1-10 mile) and farmland / rolling hills (11 to 18 mile). When terrain exceeds 20 % slope, it will be hand cut to minimize any potential erosion problems.

3.8 List areas of spanned canyons and the type of cutting needed.

During the last vegetation cycle many large trees encroaching the conductor were removed from every canyon span. We have no plans to remove any more trees from canyons at this time or even the next 2 subsequent cycles. We have maintained a least a 50'- foot clearance with past efforts.

4. DETERMINE VEGETATION CONTROL METHODS

4.1 List Methods that will be used in areas not previously addressed in steps above.

Attached is a contract detail sheet with specific span- by- span prescription and analysis as to what will be accomplished (see attachment).

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

All limbs and woody debris generated from manual cutting will be chipped and hauled away from any sensitive site. That includes all street, road, highway, and railway crossings. In non-sensitive sites (forest land), standard cut, lop, and scatter methods will be used when hand cutting. Machine mowing mulches and grinds woody debris into small pieces.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

None planned, open sunlight and naturally disturbed areas enhance native grasses to flourish. Sufficient native plants already exist. In mowing areas, the mowers cut slightly above grade. This prevents erosion and stimulates existing grass. Seeding is not needed.

5.3 If not using native seed/plants, describe why.

N/A

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

N/A

6. DETERMINE MONITORING NEEDS

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

NRS will be on site 1 day per week during the project. After 3 months, NRS will make a site visit to evaluate control and plan follow-up treatments.
TLM makes annual ground patrol. BPA helicopters patrol 3 times a year.

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

If mitigation was put in place, on site visit will be conducted to monitor. Otherwise no mitigation is expected.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are "substantial".

None, Project is consistent with EIS.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

None